

**STATEMENT OF BASIS (AI No. 18340)**

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0084859 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Darrow Fleeting and Switching, Inc.  
Post Office Box 301  
Darrow, Louisiana 70725

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** July 18, 2007

**1. PERMIT STATUS****A. Reason For Permit Action:**

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

**B.** LPDES permit - LA0084859  
LPDES permit effective date: November 1, 2002  
LPDES permit expiration date: October 31, 2007

**C.** Date Application Received: May 3, 2007

**2. FACILITY INFORMATION****A. FACILITY TYPE/ACTIVITY - barge cleaning facility**

Darrow Fleeting and Switching, Inc. is an existing barge cleaning, repair, and fleeting facility. Two types of barges are cleaned: (1) grain and other dry bulk cargo barges (2) coke and coal barges. Residual grain or other commodities remaining in the barges are removed by dry methods and the barges are washed using Mississippi River water with no soaps or detergents. The facility moors barges awaiting movement to or from other locations for various clients engaged in the transfer of marine cargo on the Mississippi River. Services to the barges in the fleet may include moorage, pump-out, cleaning or repair. Barge repairs primarily consist of cutting and welding steel plate on damaged client barges. Painting is limited to touch-ups, and no abrasive blasting or paint chipping is conducted at the facility

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 2

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4491\*\*, 3731

\*\*Appendix A - Section IV (Relation of 1987 to 1977 Industries) of the Standard Industrial Classification Manual, the SIC code 4491 is equivalent to a previous SIC code of 4463

C. LOCATION - at Mississippi River Mile 175 M.A.H.P. on the left descending bank, between Mississippi River Mile 172 and 175 M.A.H.P. on the left descending bank and Mississippi River Mile 180 M.A.H.P. on the right and left descending bank, Darrow, Ascension Parish (Latitude 30°7'04", Longitude 90°59'06")

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity barge washwater  
Treatment: none  
Location: at the point of discharge from the barge being cleaned (Latitude 30°06'57", Longitude 90°59'05")  
Flow: 25,600 gpd  
Discharge Route: directly to the Mississippi River

Outfall 002

Discharge Type: coal and coke barge washwater  
Treatment: none  
Location: at the point of discharge from the barge being cleaned (Latitude 30°06'57", Longitude 90°59'05")  
Flow: 14,850 gallons per barge  
Discharge Route: directly to the Mississippi River

Outfall 003

Discharge Type: treated sanitary wastewater  
Treatment: sewage treatment plant (aerator, clarifier, and chlorination)  
Location: at the point of discharge from the sewage treatment plant (Latitude 30°07'03", Longitude 90°59'11")  
Flow: 500 gpd  
Discharge Route: directly to the Mississippi River

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 3

Outfall 04A

Discharge Type: incoming ballast from customer barges  
Treatment: none  
Location: at the point of discharge from the customer barges  
(Latitude 30°06'57", Longitude 90°57'01")  
Flow: intermittent  
Discharge Route: directly to the Mississippi River

Outfall 04B

Discharge Type: maintenance barge ballast water  
Treatment: none  
Location: at the point of discharge from the maintenance barges  
(Latitude 30°06'57", Longitude 90°57'01")  
Flow: intermittent  
Discharge Route: directly to the Mississippi River

**4. RECEIVING WATERS**

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
d. drinking water supply

**5. PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

Changes from previous permit:

Outfalls 004A and 004B have been renamed Outfall 04A and Outfall 04B.

**6. COMPLIANCE HISTORY/COMMENTS**

A. Compliance History

There have been no recent inspections at the facility.

Statement of Basis for  
 Darrow Fleeting and Switching, Inc.  
 LA0084859, AI No. 18340  
 Page 4

#### B. DMR Review/Excursions

All DMR's were submitted in accordance with the existing permit. The excursions found are as follows:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
3/07	COD	004A	554 mg/L	250 mg/L
12/05	BOD	003	109 mg/L	45 mg/L
12/05	TSS	003	46 mg/L	45 mg/L
12/05	Fecal Coliform	003	<2000 col	400 col/100 mL
10/05	COD	004A	264 mg/L	250 mg/L
6/05	TSS	003	57 mg/L	45 mg/L

#### 7. EXISTING EFFLUENT LIMITS

Outfall 001 - dry commodity barge washwater

No effluent limitations were established for dry commodity washwaters. Best Management Practices (BMPs) for barge operations were included in Part II.

Outfall 002 - washwater from coal and coke barges

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - mgd	Report 1/week Est.	Report 1/week Est.
TSS	Report 1/month Grab	Report 1/month Grab
COD	250 mg/L 1/week Grab	400 mg/L 1/week Grab
pH	6.0 - 9.0 s.u. 1/week Grab	

Statement of Basis for  
 Barrow Fleeting and Switching, Inc.  
 LA0084859, AI No. 18340  
 Page 5

Outfall 003 - treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Weekly Average
Flow - mgd	Report 1/6 months Est.	Report 1/6 months Est.
BOD	---	45 mg/L 1/6 months Grab
TSS	---	45 mg/L 1/6 months Grab
Fecal Coliform	---	400 col/100 mL 1/6 months Grab
pH	6.0 - 9.0 s.u. 1/6 months Grab	

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 6

Outfalls 004A and Outfall 004B - incoming ballast water from customer barges  
and maintenance ballast water

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - mgd	Report 1/week Est.	Report 1/week* Est.
COD	---	250 mg/L 1/week* Grab
Oil & Grease	---	15 mg/L 1/week* Grab
pH	6.0 - 9.0 s.u. 1/week* Grab	

\*1/month for maintenance ballast water only when a visible sheen is present

#### 8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated 9/29/06 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

#### 9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 7

"Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

#### **10. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

#### **11. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
 Darrow Fleeting and Switching, Inc.  
 LA0084859, AI No. 18340  
 Page 8

### Rationale for Darrow Fleeting and Switching, Inc.

1. Outfall 001 - dry commodity barge washwater (estimated flow is 25,600 gpd)

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities. See Attachment A. Best Management Practices (BMPs) for barge operations are listed in Part II.

2. Outfalls 002 - coal and coke barge washwater (estimated flow is 500 gallons per week)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg:Daily Max	

Flow	Report:Report	
COD	250:400 mg/L	*
TSS	Report:Report	*
pH	6.0 - 9.0 s.u.	*

Treatment: none

Monitoring Frequency: 1/week at the point of discharge from the customer barges; 1/month at the point of discharge from the work, spar, or office barge (maintenance ballast) when a visible sheen is present

\*Limits Justification: BPJ, previous permit, and similar outfalls. This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos." This facility does not clean tanks. The facility cleans open and closed top hoppers only.



Statement of Basis for  
 Barrow Fleeting and Switching, Inc.  
 LA0084859, AI No. 18340  
 Page 9

3. Outfall 003 - treated sanitary wastewater (estimated flow is 500 gpd)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg:Weekly Avg. (mg/l)	
Flow	---:Report	
BOD <sub>5</sub>	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
TSS	---:45 mg/L	LPDES General Permit LAG480000 (BPJ)
Fecal Coliform	---:400/100mL	LPDES General Permit LAG480000 (BPJ)
pH	6.0 -9.0 s.u.	LPDES General Permit LAG480000 (BPJ)

**Treatment:** sewage treatment plant (aerator, clarifier, and chlorination)

**Monitoring Frequency:** 1/6 months for all parameters at the point of discharge from the sewage treatment plant located on the east side of the facility.

**Limits Justification:** Light Commercial Facilities General Permit LAG480000, Schedule A.

4. Outfalls 04A and 04B - incoming ballast water from customer barges and maintenance ballast water (estimated flow is intermittent)

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg:Daily Max	
Flow	Report:Report	*
COD	---:250 mg/L	*
Oil & Grease	---:15 mg/L	*
pH	6.0 - 9.0 s.u.	*

**Treatment:** none

**Monitoring Frequency:** 1/week at the point of discharge from the customer barges; 1/month at the point of discharge from the work, spar, or office barge (maintenance ballast) when a visible sheen is present

**\*Limits Justification:** BPJ, previous permit, and similar outfalls.

\* Existing permits for similar outfalls  
 BPJ Best Professional Judgement  
 su Standard Units

**NOTE**

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 10

**STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT**

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, stormwater shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4499 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have equipment cleaning operations. In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 3731 are considered to have stormwater discharges associated with industrial activity. This facility is covered under both SIC codes; therefore, an SWP3 plan is required.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).

In addition, the facility is subject to Best Management Practices (BMPs) for cleaning dry cargo barges (see Part II of the permit).

**TMDL/303(d) WATERBODIES**

The discharges from Darrow Fleeting and Switching, Inc. are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

Statement of Basis for  
Darrow Fleeting and Switching, Inc.  
LA0084859, AI No. 18340  
Page 11

## Attachment A

### Commodity List

#### Outfall 001

Aggregate (limestone, rock, etc.)  
Alumina  
Aluminum  
Barite  
Bauxite  
Copper  
Ferro alloys (ferro manganese, ferro silicon, silicon manganese, ferro chrome)  
Fertilizers  
Solid or Prilled Sulphur  
Fluorspar  
Food Additives and other Biological Feedstocks  
Food Products (Sugar, Salt, etc.)  
Grains  
Graphite  
Gypsum  
Iron Ore  
Lead  
Manganese  
Miscellaneous ores, alloys, and minerals  
Pig Iron  
Rubber Products  
Scrap Metal (Stainless, Ferrous, etc.)  
Silica (Olivine, Zircon, Bulk, etc.)  
Wood Products  
Zinc

#### Outfall 002

Coal and Coke